

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: CARLA DENITA MUSE
AND CHRISTOPHER MUSE**

CHAPTER 13

DEBTORS

CASE NO. 16-13256 JDW

RESPONSE TO TRUSTEE'S MOTION TO DISMISS [DOCUMENT NO. 115]

COME NOW Carla Denita Muse and Christopher Muse, by and through their attorney of record and in response to the Trustee's Motion To Dismiss and would show as follows:

The Debtor respectfully requests that their Chapter 13 not be dismissed. Debtor lost his job in August and got behind on his payments. Debtor is now working and making regular plan payments. Debtors request any arrearage be paid over the remaining months of the plan.

WHEREFORE, PREMISES CONSIDERED, Debtors pray, upon a hearing hereon, this Court deny Trustee's Motion To Dismiss. Debtor prays also for such other relief, general or specific, to which they may be entitled.

RESPECTFULLY SUBMITTED,

/s/ Robert H. Lomenick
ROBERT H. LOMENICK, MSB #104186
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CERTIFICATE OF SERVICE

I, Robert H. Lomenick, Attorney for Debtor, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Response To Motion To Dismiss the Debtor, either by electronic means or by United States Mail to the following:

**Locke Barkley
Chapter 13 Trustee
6360 I-55 North, Ste. 140
Jackson, Mississippi 39211**

**Office of U.S. Trustee
501 East Court Street, Suite 6-430
Jackson, Mississippi 39201**

This the 5th day of December, 2019.

/s/ Robert H. Lomenick
ROBERT H. LOMENICK